

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Case No. 18-CR-134 (S-2) (KAM)

UNITED STATES OF AMERICA  
v.  
DONVILLE INNISS, *ET AL.*

**NOTICE OF MOTION FOR *PRO HAC VICE* ADMISSION**  
**OF RONALD G. DEWAARD**

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

United States of America

18-CR-134 (S-2) (KAM)

Plaintiff(s),

v.

Donville Inniss, et al.,

Defendant(s).

**AFFIDAVIT IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

I, Ronald G. DeWaard, being duly sworn, hereby depose and say as follows:

1. I am a(n) Partner with the law firm of Varnum, LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate(s) of Good Standing annexed hereto, I am a member in good standing of the bar of the state(s) of Michigan.
4. There are no pending disciplinary proceedings against me in any state or federal court <sup>True</sup>
5. I Have not been convicted of a felony. If you have, please describe facts and circumstances.
6. I Have not been censured, suspended, disbarred or denied admission or readmission by any court. If you have, please describe facts and circumstances.
7. Attorney Registration Number(s) if applicable: P44117
8. Wherefore, your affiant respectfully submits that s/he be permitted to appear as counsel and advocate *pro hac vice* in case 18-CR-134 (S-2) (KAM) for Defendant, Ingrid Innes, for the purpose of responding to the United States' Motion (ECF No. 54) regarding whether a document created by Ingrid Innes, for her attorney, is protected by the attorney-client privilege.

Date 9/3/19

Grand Rapids, MI

Signature of Movant Ronald G. DeWaard

Firm Name Varnum, LLP

Address 333 Bridge Street, N.W., Suite 1700

Grand Rapids, MI 49504

Email rgdewaard@varnumlaw.com

Phone (616) 336-6000

**NOTARIZED**

Subscribed and sworn to before  
me this 3rd day of September, 2019.

Susan M. Nawara

SUSAN M. NAWARA  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF KENT  
My Commission Expires: August 17, 2024  
Acting in the County of Kent